

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NETSOC, LLC, )  
Plaintiff, )  
v. )  
YAHOO! INC. )  
Defendant. )  
                        )  
                        )      **Civil Action No. 1:18-cv-12267**  
                        )  
                        )  
                        )      **JURY TRIAL DEMANDED**  
                        )

**PLAINTIFF'S FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

NetSoc, LLC (“NetSoc”) files this First Amended Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,978,107 by Oath Inc.<sup>1</sup>, alleging as follows:

**I. THE PARTIES**

1. Plaintiff NetSoc is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.
2. On information and belief, Oath Inc. (“Oath”) is a foreign corporation organized and existing under the laws of Delaware, with a principal place of business located at 770 Broadway, New York, New York 10003-9562. Counsel for Oath Inc., Kevin P. Anderson, Duane Morris, LLP 505 9<sup>th</sup> Street, N.W., Suite 1000, Washington, DC 20004-2166 has agreed to accept service. On information and belief, Oath sells and offers to sell products and services throughout New York, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this judicial district.

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<sup>1</sup> The business units of Yahoo, Inc. that are the subject of this Complaint were sold to Verizon and now known as Oath Inc.

## **II. JURISDICTION AND VENUE**

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court also has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff is a limited liability company organized under the laws of the State of Texas and Defendant is a Delaware Corporation with a principal, physical place of business at 229 West 43rd Street, New York, New York 10036. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of New York and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in this judicial district.

6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in New York and this District.

### **III. INFRINGEMENT ('107 Patent)**

7. On May 22, 2018, U.S. Patent No. 9,978,107 (“the ‘107 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ‘107 patent by assignment.

8. The ‘107 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.

9. Oath maintains, operates, and administers a website at [www.Oath.com](http://www.Oath.com) that infringes one or more claims of the ‘107 patent, including at least claims 1-11, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘107 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

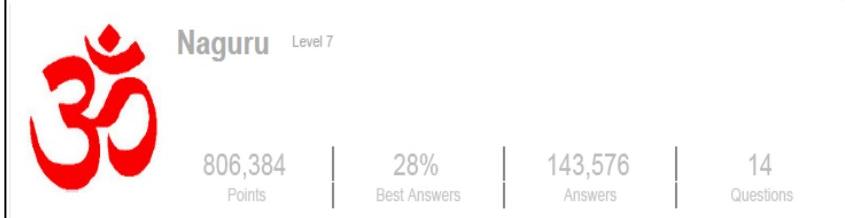
10. Support for the allegations of infringement may be found in the following preliminary table:

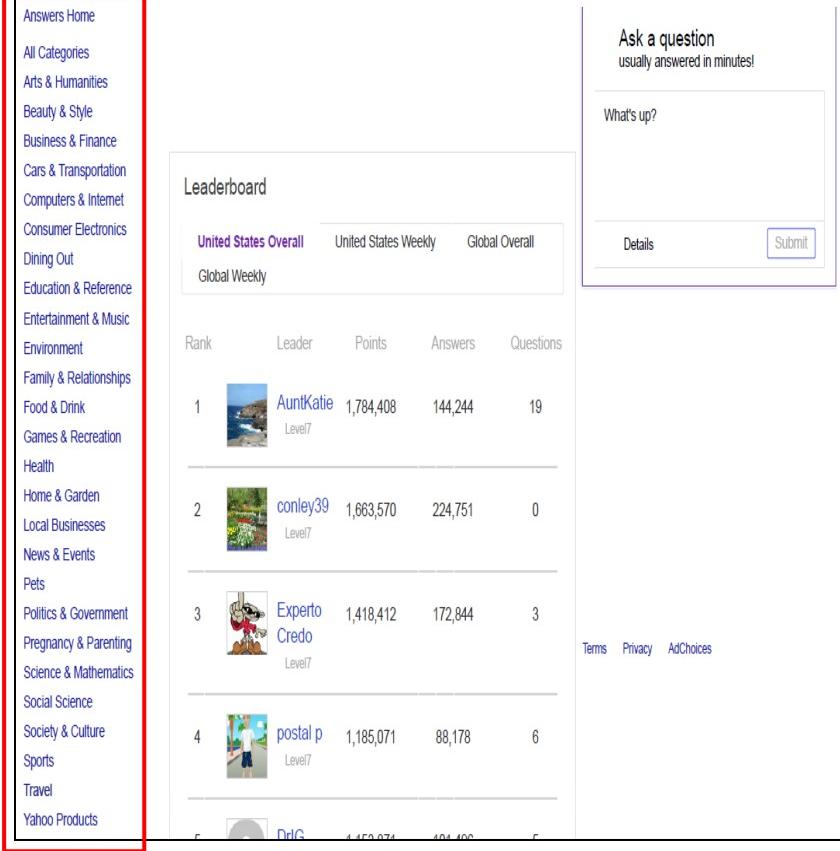
<b>Claim 1</b>	<b>Accused Product or Service</b>
1. A method for establishing a social network, the method comprising:	Plaintiff contends that Oath Answers Service offers a method of social network.

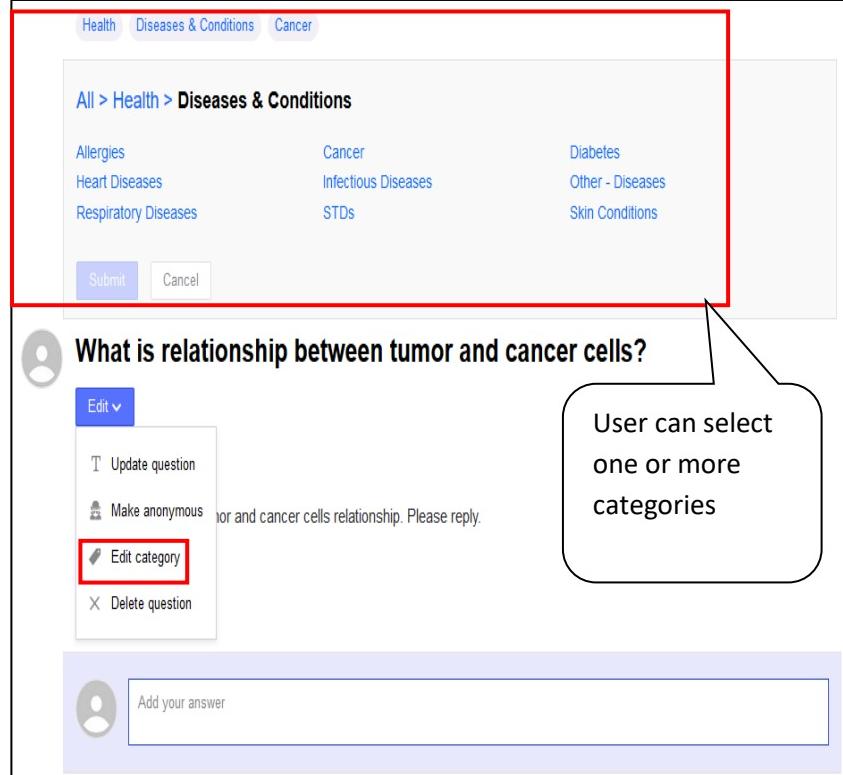
Claim 1	Accused Product or Service
	<p style="text-align: center;"><b>Knowledge Sharing in the Online Social Network of Yahoo! Answers and Its Implications</b></p> <p style="text-align: center;">Haiying Shen*, Senior Member, IEEE, Ze Li, Jinwei Liu, Joseph Edward Grant</p> <p><b>Abstract—</b>Question and Answer (Q&amp;A) websites such as Yahoo! Answers provide a platform where users can post questions and receive answers. These systems take advantage of the collective intelligence of users to find information. In this paper, we analyze the online social network (OSN) in Yahoo! Answers. Based on a large amount of our collected data, we studied the</p> <p><b>Attachment 1 (Knowledge Sharing in the Online Social Network of Oath Answers and Its Implications (2014)) at 1.</b></p>
<p>maintaining a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to one or more individuals, wherein the list also includes information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p>	<p>Plaintiff contends that with the help of data-centers or servers, Oath maintains data of plurality of participants or individuals along with their information.</p> <p><b>Yahoo! kicks off US\$500m data center consolidation</b></p> <p><a href="http://www.yahoo.com">Yahoo!</a> is revamping its entire data center infrastructure. The company is investing more than \$500m in new data center construction on three continents, its VP of operations Scott Noteboom announced at the <a href="http://www.datacenterdynamics.com/conferences/2011/new-york">DatacenterDynamics New York 2011 conference</a> (<a href="http://www.datacenterdynamics.com/conferences/2011/new-york">URL=http://www.datacenterdynamics.com/conferences/2011/new-york</a>) on Thursday, 10 March.</p> <p>Many of the new data centers will be built to the next generation of Yahoo!'s data center design called Flex Tier Data Center. The multi-tier design promises to reduce construction time to five months per phase, lower cost to \$3m-\$5m per 1MW and provide higher uptime for critical applications.</p> <p><b>Attachment 3 (Oath kicks off US\$500m data center consolidation   News   DatacenterDynamics (Webpage, 2011)) at 1 and 2.</b></p> <div style="border: 1px solid black; padding: 10px;"> <p>Yahoo stores and maintains a list of its participants or customers along with their associated information.</p> </div>

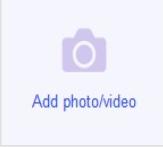
Claim 1	Accused Product or Service																																			
	<p>Leaderboard</p> <p>United States Overall      United States Weekly      Global Overall Global Weekly</p> <table> <thead> <tr> <th data-bbox="638 523 687 551">Rank</th> <th data-bbox="817 523 899 551">Leader</th> <th data-bbox="980 523 1046 551">Points</th> <th data-bbox="1111 523 1209 551">Answers</th> <th data-bbox="1274 523 1388 551">Questions</th> </tr> </thead> <tbody> <tr> <td data-bbox="654 608 670 635">1</td><td data-bbox="719 593 801 677"> AuntKatie Level7</td><td data-bbox="931 608 1062 635">1,784,408</td><td data-bbox="1111 608 1209 635">144,244</td><td data-bbox="1323 608 1356 635">19</td></tr> <tr> <td data-bbox="654 756 670 783">2</td><td data-bbox="719 720 801 804"> conley39 Level7</td><td data-bbox="931 756 1062 783">1,663,570</td><td data-bbox="1111 756 1209 783">224,751</td><td data-bbox="1323 756 1356 783">0</td></tr> <tr> <td data-bbox="654 903 670 931">3</td><td data-bbox="719 868 801 952"> Experto Credo Level7</td><td data-bbox="931 903 1062 931">1,418,412</td><td data-bbox="1111 903 1209 931">172,844</td><td data-bbox="1323 903 1356 931">3</td></tr> <tr> <td data-bbox="654 1072 670 1100">4</td><td data-bbox="719 1079 801 1163"> postal p Level7</td><td data-bbox="931 1072 1062 1100">1,185,071</td><td data-bbox="1111 1072 1209 1100">88,178</td><td data-bbox="1323 1072 1356 1100">6</td></tr> <tr> <td data-bbox="654 1220 670 1248">5</td><td data-bbox="719 1184 801 1269"> DrIG Level7</td><td data-bbox="931 1220 1062 1248">1,153,871</td><td data-bbox="1111 1220 1209 1248">101,496</td><td data-bbox="1323 1220 1356 1248">5</td></tr> <tr> <td data-bbox="654 1347 670 1374">6</td><td data-bbox="719 1311 801 1396"> nas88car Level7</td><td data-bbox="931 1347 1062 1374">1,083,434</td><td data-bbox="1111 1347 1209 1374">101,251</td><td data-bbox="1307 1347 1356 1374">464</td></tr> </tbody> </table>	Rank	Leader	Points	Answers	Questions	1	 AuntKatie Level7	1,784,408	144,244	19	2	 conley39 Level7	1,663,570	224,751	0	3	 Experto Credo Level7	1,418,412	172,844	3	4	 postal p Level7	1,185,071	88,178	6	5	 DrIG Level7	1,153,871	101,496	5	6	 nas88car Level7	1,083,434	101,251	464
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Level 7	Level 7	Level 7	Level 7	Level 7	Level 7	Level 7																																																											

Claim 1	Accused Product or Service
	<p>Information associated with each participant or individual is stored or maintained.</p> 
	<p><b>About Naguru:</b> I am 70 (in 2012) retired from Indian Central Government Service. We have a family background in Vedic knowledge, philosophy, mental health, social service, psychology, religion, yoga, music, Bhajan, etc. Such things are running in our blood and nerves. Following my family tradition, I also keep updating myself and trying to make use of my knowledge, time, influence, energy and resources for higher pursuits. I want to invest in lot of good-will. And my motto is 'Be Good and Do Good'. I am General Secretary of our Colony Senior Citizens Daycare &amp; Welfare Association.</p> <p>Mind and its peculiarities are my favorite subjects.</p> <p>My oft repeated quote is "Bring maximum happiness to maximum number of people for maximum time". <a href="#">show less</a></p> <p><a href="#">Questions</a> <a href="#">Answers</a> <a href="#">More</a></p> <p><a href="#">Can knowledge be transferred or transmitted - OR - Knowledge comes out of learning and practice alone?</a> R &amp; S, Philosophy Section people may be able to throw some light. 30 answers · <a href="#">Indonesia</a> · 5 years ago</p> <p><a href="#">Why I am getting such notice?</a> Sorry, we couldn't find who you were looking for This person may not exist, there may be a problem with the link or **gulp** their account has been suspended. 14 answers · <a href="#">Do It Yourself (DIY)</a> · 7 years ago</p>
	<p><b>Attachment 4 (Questions   Oath Answers (Webpage, 2018)) at 1.</b></p> <p>presenting a user with a plurality of categories from which the user may make a selection of a category from the plurality of categories;</p> <p>Plaintiff contends that user (or asker) is presented with plurality of categories from which the user can select one or more categories.</p>

Claim 1	Accused Product or Service
	<p>Answers Home  All Categories  Arts &amp; Humanities  Beauty &amp; Style  Business &amp; Finance  Cars &amp; Transportation  Computers &amp; Internet  Consumer Electronics  Dining Out  Education &amp; Reference  Entertainment &amp; Music  Environment  Family &amp; Relationships  Food &amp; Drink  Games &amp; Recreation  Health  Home &amp; Garden  Local Businesses  News &amp; Events  Pets  Politics &amp; Government  Pregnancy &amp; Parenting  Science &amp; Mathematics  Social Science  Society &amp; Culture  Sports  Travel  Yahoo Products</p>  <p>The screenshot shows a 'Leaderboard' section on the Oath Answers website. It includes tabs for 'United States Overall', 'United States Weekly', 'Global Overall', and 'Global Weekly'. The main table lists four users: AunlKalie (rank 1, 1,784,408 points), conley39 (rank 2, 1,663,570 points), Experto Credo (rank 3, 1,418,412 points), and postal p (rank 4, 1,185,071 points). Each user entry includes their profile picture, name, level, and a small description.</p> <p>Ask a question usually answered in minutes!</p> <p>What's up?</p> <p>Details      Submit</p> <p>Terms    Privacy    AdChoices</p> <p>User can select one or more categories</p> <p><b>Ask clearly.</b> Keep your question clear and descriptive. Use simple grammar. It helps people find your questions, and you'll also get better answers. <a href="#">Read more</a></p> <p><b>Categorize correctly.</b> Categorize your question in the appropriate category. You will receive better and more relevant answers. <a href="#">Read more</a></p> <p>Attachment 2 (Leaderboard   Oath Answers (Webpage, 2018)) at 1.</p> <p>Attachment 5 (Community Guidelines   Oath Answers (Webpage, 2018)) at 1.</p>

Claim 1	Accused Product or Service
	 <p data-bbox="594 1132 1437 1220"><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>
<p>receiving the selection of the category by the user; in conjunction with the selection of the category, receiving an electronic communication from the user for an unidentified respondent, wherein the electronic communication contains an inquiry of the user;</p>	<p>Plaintiff contends that user can select one or more categories as well as can describe his inquiry as a message, which is posted on the Oath Answers. Also, the respondents or answerers remain unidentified.</p> <p data-bbox="616 1558 1432 1727">User can type his inquiry as well as can also specify relevant category with respect to his inquiry by selecting at least one category.</p>

Claim 1	Accused Product or Service
	<p>What is relationship between tumor and cancer cells?</p> <p>Hello,</p> <p>I want to know about tumor and cancer cells relationship. Please reply.</p> <p>Thanks.</p> <div style="border: 1px solid red; padding: 10px; margin-top: 10px;">  Add photo/video  <p>Submit Cancel</p> <p>Asking a question costs 5 points, but you'll get back 3 points when you choose a Best Answer. Question should follow the <a href="#">Community Guidelines</a></p> </div> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; position: absolute; bottom: 20px; right: 20px; width: fit-content;">     Electronic communication (containing inquiry) from the user for an unidentified respondent   </div>

### [Snapshot taken after creating a user profile in Oath Answers]

All > Health > Diseases & Conditions

Allergies      Cancer      Diabetes  
 Heart Diseases      Infectious Diseases      Other - Diseases  
 Respiratory Diseases      STDs      Skin Conditions

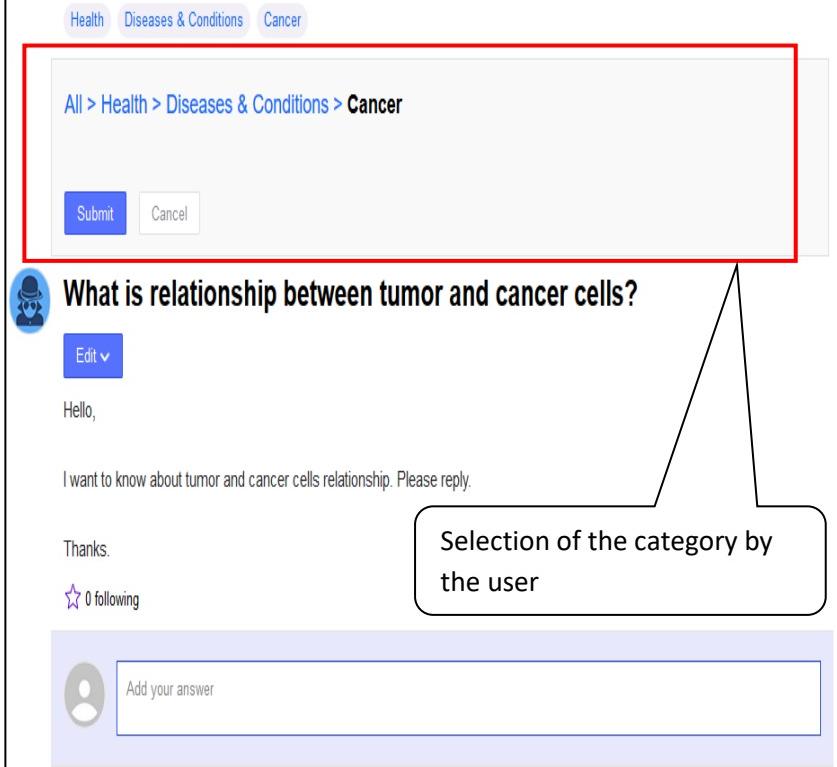
Submit Cancel

What is relationship between tumor and cancer cells?

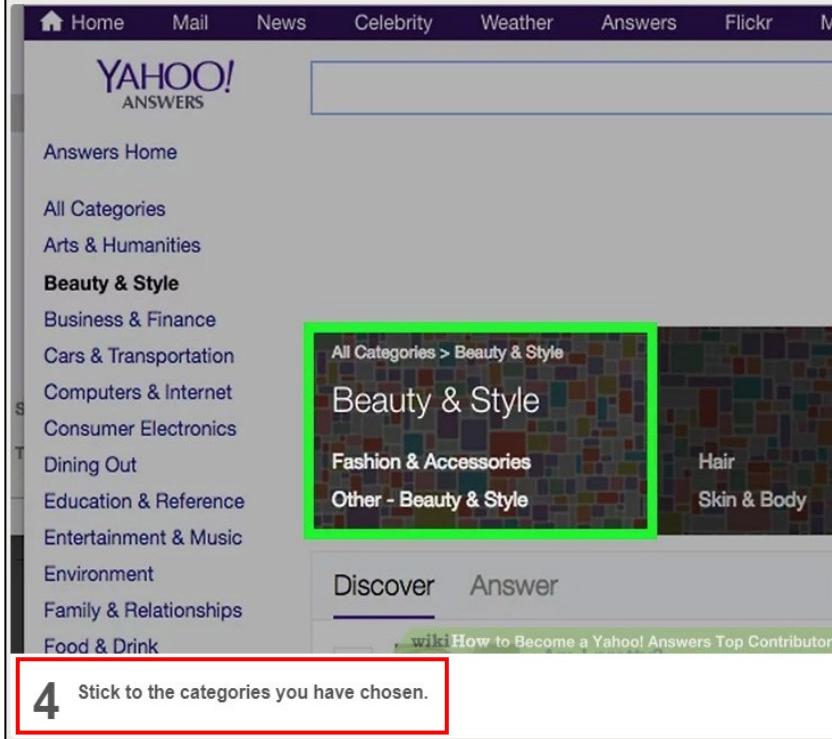
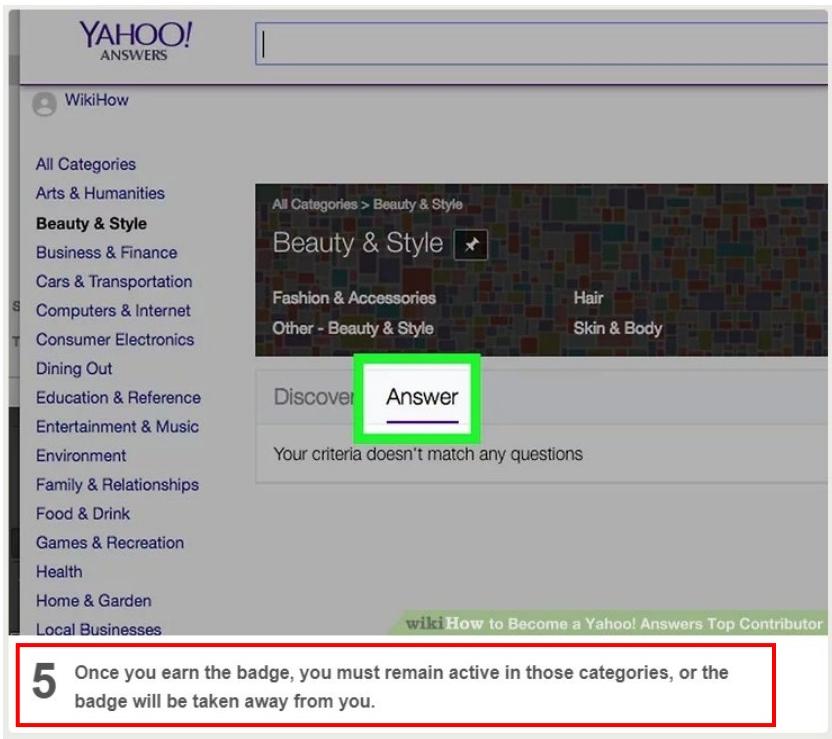
Edit ▾  
 T Update question  
 Make anonymous  
 Edit category

Add your answer

User can select one or  
more categories

Claim 1	Accused Product or Service
	<p>[Snapshot taken after creating a user profile in Oath Answers]</p>  <p>What is relationship between tumor and cancer cells?</p> <p>Selection of the category by the user</p> <p>[Snapshot taken after creating a user profile in Oath Answers]</p>
<p>after receiving the selection of the category by the user, selecting one or more participants from the list to receive the electronic communication, wherein selecting is based at least in part on the selection of the category or the information associated with at least one of each participant or the one or more individuals that</p>	<p>Plaintiff contends that each participant on Oath Answers can select one or more categories based on his interest or expertise or knowledge so that he can answer any questions (related to those categories) of one or more users. When user posts any question or inquiry along with selection of the category (for unidentified respondents), those participants who have opted the same category which is mentioned in user's inquiry, they can see the user's question or inquiry on their profile pages and can respond to the user's inquiry.</p>

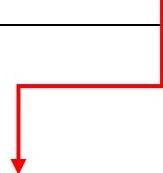
Claim 1	Accused Product or Service
<p>correspond to each participant;</p> <p>Each participant can select at least one category to answer any questions related to that category.</p>	 <p>Special Feature</p> <p>Want to know what others think? Ask aw. <a href="#">How can the Philippines use its n...</a> asked by Yeoj</p> <p>Discover Answer</p> <p><b>What to do about my super liberal husband?</b> I am an avid Trump supporter who is married to a rad twice, but he also voted for Bernie Sanders during the election due to his opposition to both presidential 183 answers · Politics · 2 days ago</p> <p>wiki <a href="#">How to Become a Yahoo! Answers Top Contributor</a></p> <p><b>2</b> Browse through categories and choose some that you believe you know a lot in or could be helpful in.</p> <p><b>Attachment 6 (How to Become a Oath Answers Top Contributor (Webpage)) at 1.</b></p>

Claim 1	Accused Product or Service
	 <p>All Categories &gt; Beauty &amp; Style</p> <p><b>Beauty &amp; Style</b></p> <p>Fashion &amp; Accessories</p> <p>Other - Beauty &amp; Style</p> <p>Discover Answer</p> <p>4 Stick to the categories you have chosen.</p>
	<p><i>Id. at 2.</i></p>  <p>All Categories &gt; Beauty &amp; Style</p> <p><b>Beauty &amp; Style</b></p> <p>Fashion &amp; Accessories</p> <p>Other - Beauty &amp; Style</p> <p>Discover <b>Answer</b></p> <p>Your criteria doesn't match any questions</p> <p>5 Once you earn the badge, you must remain active in those categories, or the badge will be taken away from you.</p> <p><i>Id. at 3.</i></p>

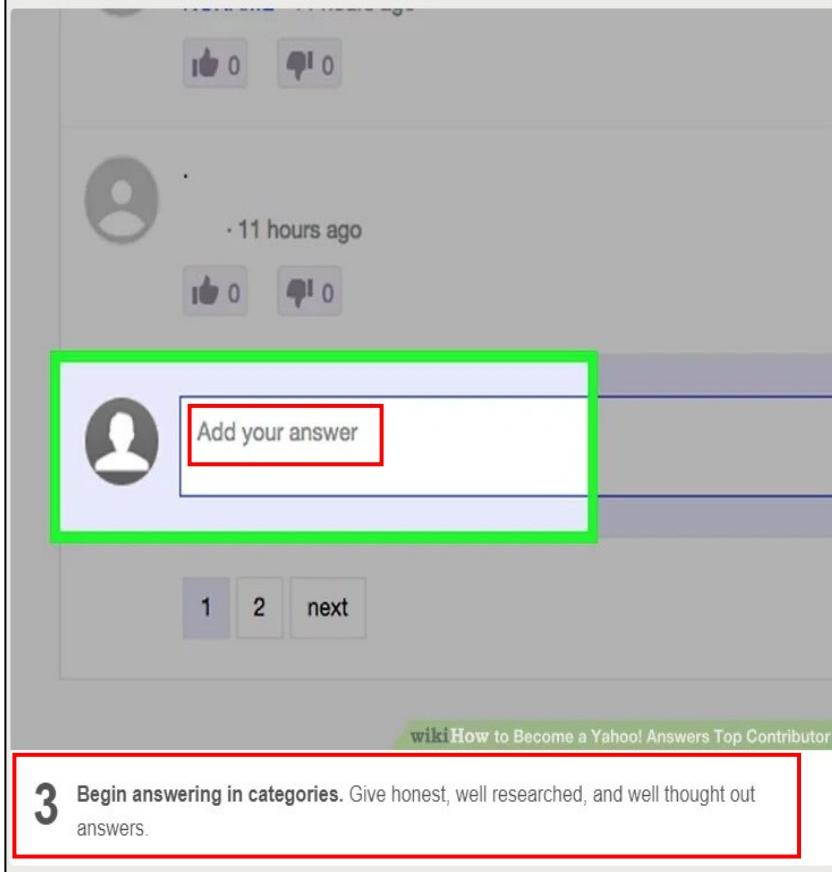
Claim 1	Accused Product or Service																														
	<p>Home Mail Tumblr News Sports Finance Entertainment Lifestyle Answers Groups Mobile</p> <p>All Categories &gt; Consumer Electronics &gt; Music &amp; Music Players</p> <p><b>Music &amp; Music Players</b></p> <p>Discover Answer</p> <p><b>What's the best way to power 4 2000w car amplifiers at home?</b> I need a way to power 4 2000w subwoofers for use in a home theater and I decided to use car amplifiers since I would be able to create my own power source of sorts by using a 12v battery. What's the best way of going about doing this? I only need the car amplifier to run at full tilt for less than 20 minutes... <a href="#">show more</a> 7 answers · 1 week ago</p> <p><b>Do you need computer to set up condenser mic?</b> 8 answers · 2 weeks ago</p> <p><b>Are MP3 players going to disappear ?</b> Since every smartphone plays MP3s ? 7 answers · 2 weeks ago</p> <p><b>I just bought BM-700 Microphone and phantom power but it seems a need a laptop for it to work? Is there a way to not been the laptop?</b> 4 answers · 2 weeks ago</p> <p><b>Our radio just quit working. It gets power. CD player &amp; aux input work fine. Radio seems to be tuning to stations, but no sound. Ideas?</b> 3 answers · 2 weeks ago</p> <p><b>Top Answerers</b></p> <table border="1"> <thead> <tr> <th></th> <th>In Music &amp; Music Players</th> <th>Best Answers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td> <a href="#">NONE</a></td> <td>11,396</td> </tr> <tr> <td>2</td> <td> <a href="#">cantilena91</a></td> <td>6,221</td> </tr> <tr> <td>3</td> <td> <a href="#">Albex</a></td> <td>5,501</td> </tr> <tr> <td>4</td> <td> <a href="#">Scatwoman</a></td> <td>4,911</td> </tr> <tr> <td>5</td> <td> <a href="#">Einat B</a></td> <td>3,650</td> </tr> <tr> <td>6</td> <td> <a href="#">Diana B</a></td> <td>2,981</td> </tr> <tr> <td>7</td> <td> <a href="#">Freckles...</a></td> <td>2,926</td> </tr> <tr> <td>8</td> <td> <a href="#">Daniel K</a></td> <td>2,890</td> </tr> <tr> <td>9</td> <td> <a href="#">SRASC</a></td> <td>2,758</td> </tr> </tbody> </table>		In Music & Music Players	Best Answers	1	 <a href="#">NONE</a>	11,396	2	 <a href="#">cantilena91</a>	6,221	3	 <a href="#">Albex</a>	5,501	4	 <a href="#">Scatwoman</a>	4,911	5	 <a href="#">Einat B</a>	3,650	6	 <a href="#">Diana B</a>	2,981	7	 <a href="#">Freckles...</a>	2,926	8	 <a href="#">Daniel K</a>	2,890	9	 <a href="#">SRASC</a>	2,758
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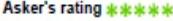
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	<p data-bbox="594 382 1346 460"><b>Attachment 7 (Music &amp; Music Players   Oath Answers (Webpage, 2018)) at 1 and 2.</b></p> <div data-bbox="594 544 1428 707" style="border: 1px solid black; padding: 10px;"> <p data-bbox="626 566 1362 686">Based on the selection of category or participant information (that is, category interests), one or more participants are shortlisted so that they can view user's inquiry or question.</p> </div>
sending the inquiry to the selected one or more participants;	Plaintiff contends that in case of Oath Answers, user's inquiry is shared with one or more participants.

<b>Claim 1</b>	<b>Accused Product or Service</b>
	<p>User's inquiry is shared with one or more participants</p>



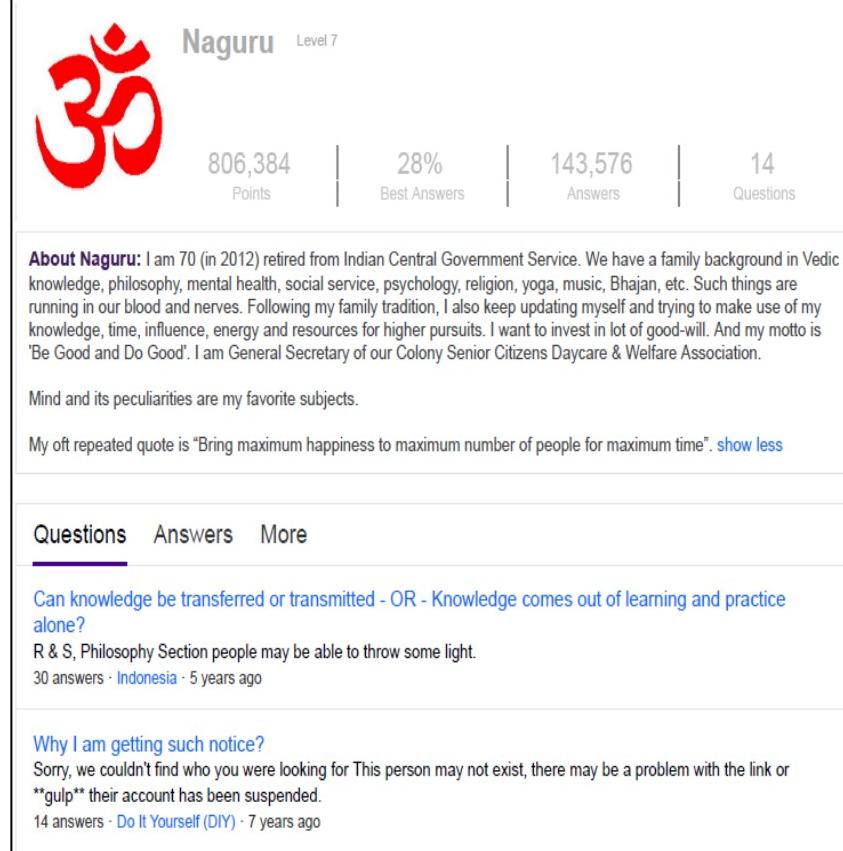
Claim 1	Accused Product or Service																														
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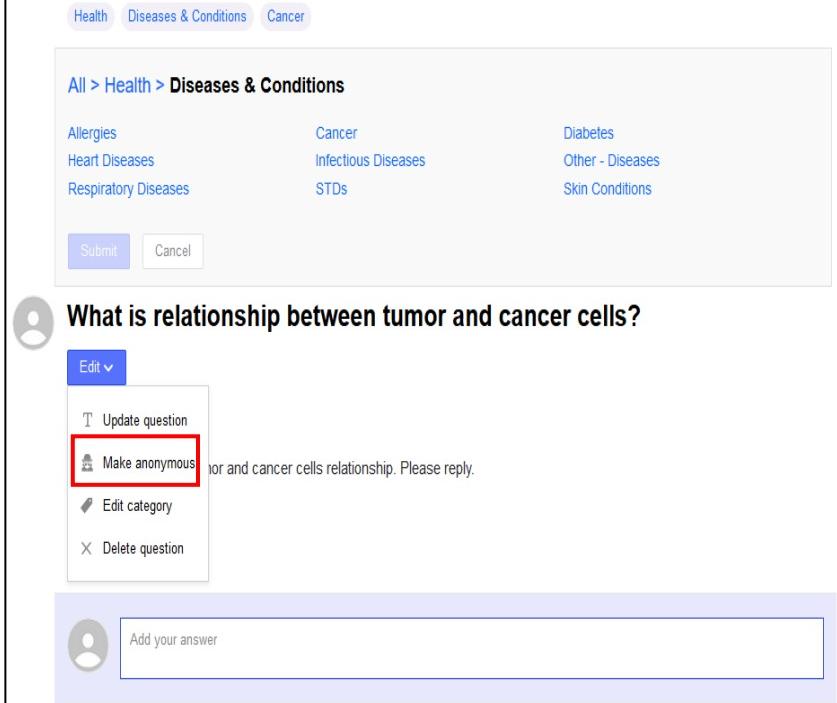
Claim 1	Accused Product or Service
	<b>Attachment 7 (Music &amp; Music Players   Oath Answers (Webpage, 2018)) at 1 and 2.</b>
<p>receiving a response to the inquiry from the selected one or more participants, the response from each of the one or more participants including biographical information about that participant;</p>	<p>Plaintiff contends that one or more participants can respond to the user's inquiry. Each participant's biographical information is also shared along with the response.</p>  <p>The screenshot shows a user interface for a Q&amp;A platform. At the top, there are like and dislike buttons with counts of 0. Below them is a user profile icon and the text '11 hours ago'. In the center, there is a box containing a user profile icon and the text 'Add your answer'. This central box is highlighted with a green border. Below this box are navigation buttons labeled 1, 2, and 'next'. At the bottom of the interface, there is a red box containing the following text:</p> <p><b>3 Begin answering in categories.</b> Give honest, well researched, and well thought out answers.</p> <p><b>Attachment 6 (How to Become a Oath Answers Top Contributor (Webpage)) at 2.</b></p>

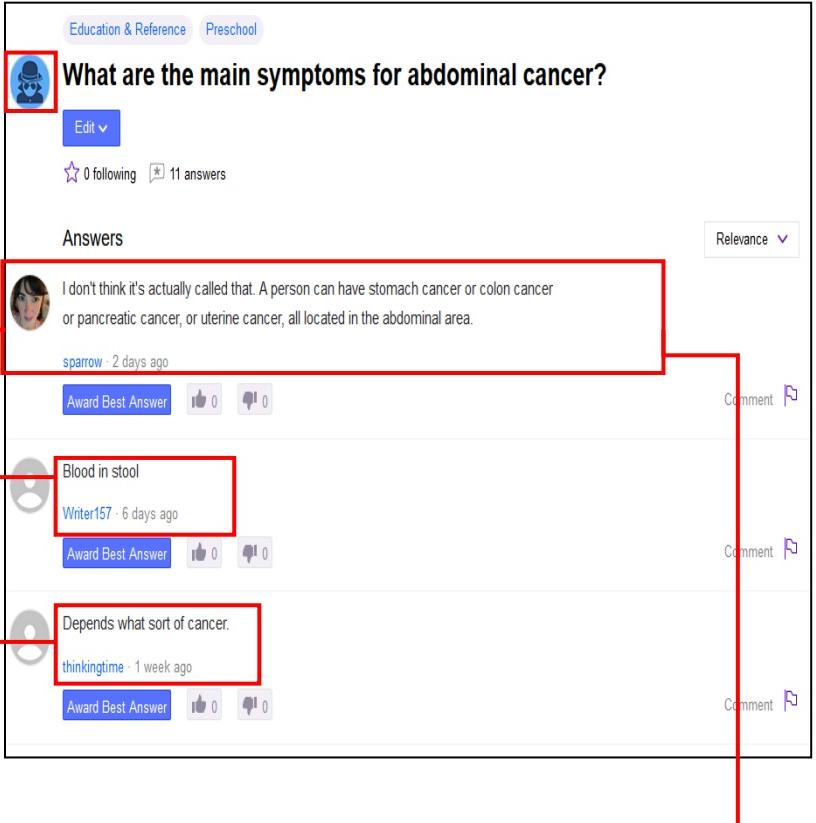
Claim 1	Accused Product or Service
<p>User's inquiry</p> <p>Responses from one or more participants along with bibliographic information</p>	<p> <b>Custom costume order gon wrong, what do I do?? Please, please help..?</b></p> <p>Okay.. so i ordered this costume for comiccon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. well i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comiccon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p> <p>Follow 3 answers</p> <p><b>Answers</b> <span style="float: right;">Relevance</span></p> <p> <b>Best Answer:</b> Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.</p> <p>Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p> <p><b>Ashley M · 1 year ago</b></p> <p><span style="border: 1px solid #ccc; padding: 2px;">1</span> <span style="border: 1px solid #ccc; padding: 2px;">0</span> <span style="float: right;">Comment</span></p> <p><b>Asker's rating</b> </p> <p> If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</p> <p>Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p> <p><b>Elaine M · 1 year ago</b></p> <p><b>Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..?   Oath Answers (Webpage)) at 1.</b></p>

Claim 1	Accused Product or Service								
	<p>Participant's bibliographic information</p> <div style="border: 2px solid red; padding: 10px;">  <p><b>Ashley M</b> Level 7</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">381,271</td> <td style="width: 25%;">39%</td> <td style="width: 25%;">55,340</td> <td style="width: 25%;">569</td> </tr> <tr> <td>Points</td> <td>Best Answers</td> <td>Answers</td> <td>Questions</td> </tr> </table> <p><b>About Ashley M:</b> I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. <a href="#">show less</a></p> <hr/> <p><a href="#">Questions</a> <a href="#">Answers</a> <a href="#">More</a></p> <p><b>How do they make eye glasses for small children?</b>    Specifically, how do they determine what prescription the child needs? Because older children and adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation?    2 answers · <a href="#">Optical</a> · 2 years ago</p> <hr/> <p><b>I'd like to learn the basics of programming and coding, please help?</b>    I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... <a href="#">show more</a>    4 answers · <a href="#">Programming &amp; Design</a> · 2 years ago</p> </div>	381,271	39%	55,340	569	Points	Best Answers	Answers	Questions
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### Attachment 9 (Questions | Oath Answers (Webpage)) at 1.

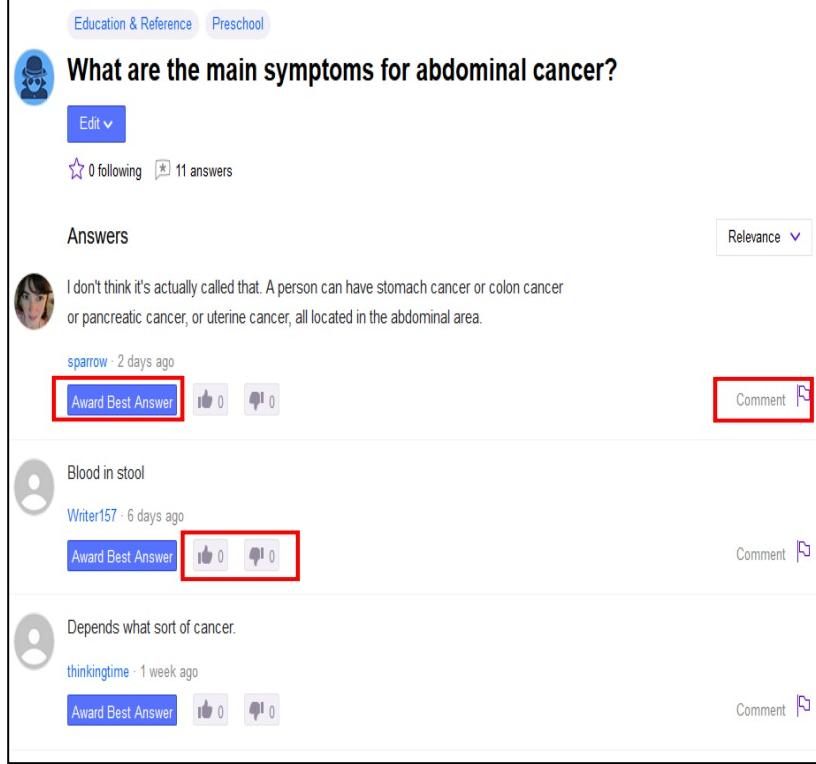
Claim 1	Accused Product or Service
	 <p><b>Naguru</b> Level 7</p> <p>806,384 Points   28% Best Answers   143,576 Answers   14 Questions</p> <p><b>About Naguru:</b> I am 70 (in 2012) retired from Indian Central Government Service. We have a family background in Vedic knowledge, philosophy, mental health, social service, psychology, religion, yoga, music, Bhajan, etc. Such things are running in our blood and nerves. Following my family tradition, I also keep updating myself and trying to make use of my knowledge, time, influence, energy and resources for higher pursuits. I want to invest in lot of good-will. And my motto is 'Be Good and Do Good'. I am General Secretary of our Colony Senior Citizens Daycare &amp; Welfare Association.</p> <p>Mind and its peculiarities are my favorite subjects.</p> <p>My oft repeated quote is "Bring maximum happiness to maximum number of people for maximum time". <a href="#">show less</a></p> <p><a href="#">Questions</a> <a href="#">Answers</a> <a href="#">More</a></p> <p><a href="#">Can knowledge be transferred or transmitted - OR - Knowledge comes out of learning and practice alone?</a> R &amp; S, Philosophy Section people may be able to throw some light. 30 answers · <a href="#">Indonesia</a> · 5 years ago</p> <p><a href="#">Why I am getting such notice?</a> Sorry, we couldn't find who you were looking for This person may not exist, there may be a problem with the link or **gulp** their account has been suspended. 14 answers · <a href="#">Do It Yourself (DIY)</a> · 7 years ago</p>
	<p><b>Attachment 4 (Questions   Oath Answers (Webpage, 2018)) at 1.</b></p> <p>publishing at least a portion of the response from each of the selected one or more participants for other users to view, wherein publishing is performed without identifying the user but includes providing biographical information about the participant who provided the response;</p> <p>Plaintiff contends that a portion of response from each participant is published for other users to view. In Oath Answers, user can anonymously post his inquiry (by selecting option “<b>Make anonymous</b>”) in which case user’s identity remains hidden. However, the biographical information of one or more participants who provided the responses can be viewed.</p>

Claim 1	Accused Product or Service
	<p>User can anonymously share his inquiry in which case user's identity remains hidden</p>  <p>All &gt; Health &gt; Diseases &amp; Conditions</p> <p>Allergies      Cancer      Diabetes  Heart Diseases      Infectious Diseases      Other - Diseases  Respiratory Diseases      STDs      Skin Conditions</p> <p>Submit      Cancel</p> <p>What is relationship between tumor and cancer cells?</p> <p>Edit ▾</p> <ul style="list-style-type: none"> <li><input type="button"/> Update question</li> <li><input checked="" type="button"/> Make anonymous <span>or and cancer cells relationship. Please reply.</span></li> <li><input type="button"/> Edit category</li> <li><input type="button"/> Delete question</li> </ul> <p>Add your answer</p> <p>[Snapshot taken after creating a user profile in Oath Answers]</p>

Claim 1	Accused Product or Service
<p>Anonymous user</p> <p>Responses from one or more participants are displayed for other users to view without identifying the user</p>	 <p><b>What are the main symptoms for abdominal cancer?</b></p> <p><b>Answers</b></p> <ul style="list-style-type: none"> <li><b>sparrow</b> · 2 days ago       <p>I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer, or uterine cancer, all located in the abdominal area.</p> </li> <li><b>Writer157</b> · 6 days ago       <p>Blood in stool</p> </li> <li><b>thinkingtime</b> · 1 week ago       <p>Depends what sort of cancer.</p> </li> </ul> <p><b>sparrow</b> · Level 6</p> <p>Follow   Block</p> <p>24,456 Points   6% Best Answers   6,786 Answers   83 Questions</p> <p>Questions   Answers   More ▾</p> <p>Why is Yahoo Answers filled with Chinese. I'd rather not see these letters because I can't read Chinese? 1 answer · Languages · 1 month ago</p> <p>If money given to the poor is stolen, does it take away its blessing? Shouldn't money be given freely in order for it to truly be a blessing? 6 answers · Other - Business &amp; Finance · 3 months ago</p> <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>

Claim 1	Accused Product or Service
	<p style="text-align: center;">Example of biographical information</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;">  <b>Ashley M</b> Level 7  <span>381,271 Points</span>   <span>39% Best Answers</span>   <span>55,340 Answers</span>   <span>569 Questions</span>  <p><b>About Ashley M:</b> I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. <a href="#">show less</a></p> <p style="margin-top: 10px;"> <a href="#">Questions</a>   <a href="#">Answers</a>   <a href="#">More</a> </p> <p><b>How do they make eye glasses for small children?</b>      Specifically, how do they determine what prescription the child needs? Because older children and adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation?      2 answers · <a href="#">Optical</a> · 2 years ago   </p> <p><b>I'd like to learn the basics of programming and coding, please help?</b>      I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... <a href="#">show more</a>      4 answers · <a href="#">Programming &amp; Design</a> · 2 years ago   </p> </div>
	<p style="text-align: center;"><b>Attachment 9 (Questions   Oath Answers (Webpage)) at 1.</b></p> <p>tracking feedback for each of the selected one or more participants based at least in part on the published portion of the response, including determining a rating from the user for at least one of the selected one or more participants.</p> <p>Plaintiff contends that feedback for each participant is tracked based on the provided response. That is, user can provide rating to at least one of the selected one or more participants.</p> <p>In case of Oath Answers, user can provide ratings out of 5 stars to one or more participants based on their responses and can award “Best Answer” to one of the responses. Besides, the user also has options to “Like” or “Dislike” the response of each participant or can provide his comment on each participant’s response.</p>

Claim 1	Accused Product or Service
<p>Based on the response, the user can provide his feedback or rating to one or more participants</p>	<p><b>Custom costume order gon wrong, what do I do?? Please, please help..?</b></p> <p>Okay.. so i ordered this costume for comicon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. hell i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comicon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p> <p>Follow    3 answers</p> <p>Answers    <span style="float: right;">Relevance</span></p> <p><b>Best Answer:</b> Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.</p> <p>Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p> <p>Ashley M · 1 year ago</p> <p><span style="border: 1px solid #ccc; padding: 2px;">1</span>    <span style="border: 1px solid #ccc; padding: 2px;">0</span></p> <p><a href="#">Comment</a></p> <p><b>Asker's rating *****</b></p> <p>If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</p> <p>Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p> <p>Elaine M · 1 year ago</p> <p><b>Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..?   Oath Answers (Webpage)) at 1.</b></p> <p>User can provide rating to each participant's response out of 5 stars, can award best answer to one of the responses, can like or dislike each participant's response, and can also comment on each participant's response.</p>

Claim 1	Accused Product or Service
	 <p data-bbox="612 1056 1321 1129"><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>

- These allegations of infringement are preliminary and are therefore subject to change.
11. Oath has and continues to induce infringement. Oath has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer services on the Internet] and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Oath has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

12. Oath has and continues to contributorily infringe. Oath has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer services on the Internet] and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Oath has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

13. Oath has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '107 patent.

#### **IV. JURY DEMAND**

NETSOC hereby requests a trial by jury on issues so triable by right.

#### **V. PRAYER FOR RELIEF**

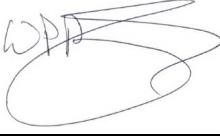
WHEREFORE, NETSOC prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '107 patent through OATH.COM;
- b. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '107 patent, in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
- c. award NETSOC an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award NETSOC its attorneys' fees, expenses, and costs incurred in this action;

- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award NETSOC such other and further relief as this Court deems just and proper.

Respectfully submitted,

**Ramey & Schwaller, LLP**

By:   
William P. Ramey, III  
Texas Bar No. 24027643  
5020 Montrose Blvd., Suite 750  
Houston, Texas 77006  
(713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)

*Attorneys for NetSoc, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record in this case is served via email on this day of March 8, 2019 or ECF in this matter.

Kevin P. Anderson  
KPAnderson@duanemorris.com  
Duane Morris, LLP  
505 9<sup>th</sup> Street, N.W., Suite 1000  
Washington, DC 20004-2166  
(202) 776-5213  
(202) 776-7801

A handwritten signature in black ink, appearing to read "WPR".

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William P. Ramey, III